DEPARTMENT OF THE ARMY
INSTALLATION MANAGEMENT AGENCY
2511 JEFFERSON DAVIS HIGHWAY
ARLINGTON, VA 22202-3926

REPLY TO
ATTENTION OF

IMAH-PLD

JAN 0 6 2006

MEMORANDUM FOR US Army Installation Management Agency (IMA) Personnel

SUBJECT: Guidance Clarifying IMA Policy Memorandum #15, Meetings and Conferences

1. REFERENCES.

    a. JTR, Vol. 2, Chap. 4, Part S: Conferences, C4950 and JFTR Vol 1, Chap 2, Part G: Conferences, U2550 .

    b. 41 C.F.R. Parts 301-11, Per Diem Expenses, and 301-74, Conference Planning.

2. PURPOSE. To clarify food and beverage aspects of IMA-sponsored conferences.

3. APPLICABILITY. This memorandum applies to all IMA-funded conferences.

4. POLICY.

    a. Generally, the Army may not use appropriated funds to pay for food or refreshments for government employees unless they are in a travel status away from their official duty station. Under extremely limited circumstances, the Army may rent a facility that includes food costs if such costs are a non-negotiable and non-separable part of the room rental contract. The overall price must be competitive with prices offered by facilities that will not provide food. Army officials may consider whether food is included when selecting a conference facility. The meeting planner/sponsor should consult the local legal office before using this unusual and limited exception to the general rule.

    b. If the Army provides meals to conference attendees (those in a travel status unless the exceptions apply), the attendee may not seek reimbursement for those meals. If the conference registration fee includes meal costs, the attendee may not seek reimbursement for those Government provided meals. Travelers should affirmatively indicate on the travel voucher the Government provided meals.

    c. Where a meal or meals are included in a registration fee, conference attendees may request reimbursement for the registration fee but may not additionally "double dip" by filing travel vouchers that seek reimbursement for the meals covered by the registration fee. Travelers must affirmatively annotate vouchers to indicate meals that

the government provided to them by way of the reimbursement for the registration fee. To support this requirement, the administrative instructions provided to attendees should specifically delineate those meals provided by the sponsoring gov't agency and included in registration fees.

d. Under limited circumstances, meals and "light refreshments" may be purchased in order that all attendees, regardless of travel status, would achieve the objectives of a valid training program. A comparison guide to discriminate between meals vice light refreshments is at enclosure. The meeting planner, in consultation with the local legal office, should review the facts of the conference and determine such legality, ensure that no subterfuge is occurring and ensure that the following criteria are satisfied:

(1) the refreshments are incidental to training;

(2) attendance is necessary for full participation in the training; and

(3) attendees are not free to purchase food elsewhere without being absent from essential training.

e. Conference planners may arrange to charge local attendees an optional non-reimbursable social fee to cover "light refreshments" and charge separately for the meal. When possible, the commercial hospitality service provider (hotel, conference center, or vendor) should collect the social fee from the attendees.

f. In cases where the Army is charging a conference or registration fee, the Army has no authority to deposit attendee funds collected for meal payments into the Treasury for later disbursement. The responsibility for collecting funds from the conference attendees should rest with the vendor rather than the Army. (Note: pending legislation could relax this restriction and grant the required authority to agencies.)

5. The request for approval (as documented in IMA Policy #15) of any conference must be forwarded through the appropriate chain of command (IMA Region or IMA HQ conference) to the Chief of Staff, IMA, ATTN: IMAH-PLD, Room 12034, Taylor Bldg., 2511 Jefferson Davis Highway, Arlington, VA 22202-3926. The request should clearly set forth the proposed treatment of "light refreshments" and present the estimated ratio of local vice TDY attendees.

a. Meeting planners must ensure any deviations, or arrangements which are exceptional and do or could raise question are reviewed by local legal offices for clarification. Any and all arrangements that result in provision of food or "light refreshments" to local attendees not on TDY status must be reviewed by counsel for compliance with this memorandum.

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6. RESPONSIBILITY. The Plans Division, IMA, is the proponent for this guidance. Point of contact is Vern Abdoo at commercial phone number (703) 602-1866, DSN 332-1866, or Vern.Abdoo@hqda.army.mil.

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as

CHRISTOPHER G. ESSIG
Colonel, MP
Chief of Staff

Meal versus Light Refreshments
Discriminators

MEALS	LIGHT REFRESHMENTS
• Time of Day; served during normal meal window	• Time of day; available during business activity period or breaks from meetings
• Time Duration; 30-60 minutes or more	• Time Duration; 10-20 minutes
• Service style / standard; full service, sit down, entrees and courses, larger plates, several hard utensils and glassware	• Service / Style; self serve, from informal tables in corridor / lobby / back of room / break room, small light paper / plastic service items
• Cost; comparable to local meals at alternative but similar sites, and to the JTR allowance	• Cost; less than meals at this or similar sites and less than JTR allowance
• Formal Menu with sit down table service or comprehensive buffet with modified table service	• No formal Menu
	• Not intended to replace a meal. Attendee could or might normally still purchase a standard meal at the appropriate time
	• Often stand / walk / talk while snacking but can be seated
	• Typically self-serve from buffet / bar / circulating servers

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